

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2003-327-C

IN RE:)	MCI'S OBJECTIONS TO
Continued Availability of Unbundled High)	BELLSOUTH
Capacity Loops at Certain Locations and)	TELECOMMUNICATIONS, INC.'S
Unbundled High Capacity Transport on Certain)	FIRST SET OF INTERROGATORIES
Routes Pursuant to the Federal Communication)	AND FIRST REQUEST FOR
Commission's Triennial Review Order)	PRODUCTION OF DOCUMENTS

MCImetro Transmission Services, LLC,¹ MCI WorldCom Communications, Inc. and MCI WorldCom Network Services, Inc., (collectively "MCI") hereby object to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories and First Requests for Production of Documents to MCI, served on November 19, 2003. Any responses made to BellSouth's interrogatories and requests for production of documents will be made subject to these and subsequent-stated objections, the Protective Agreement previously executed between the parties, and any protective order as may be issued by the South Carolina Public Service Commission (the "Commission") in this docket.

General Objections

MCI makes the following General Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents, including the applicable definitions and general

¹ BellSouth also served these same discovery requests on "MCImetro Access Transmission Services, Inc." That is the former name of MCImetro Access Transmission Services, LLC.

instructions therein (“BellSouth discovery”), which, as appropriate, are specifically identified and incorporated into the relevant responses below.

1. With regard to Interrogatories Nos. 14-26 and Requests for Production of Documents Nos. 1-5, MCI has interpreted the BellSouth discovery to apply to MCI’s regulated intrastate operations in South Carolina and will limit its responses accordingly. To the extent that any BellSouth discovery is intended to apply to matters that take place outside the state of South Carolina and which are not related to South Carolina intrastate operations subject to the jurisdiction of the Commission, MCI objects to such request as irrelevant, and, with regard to Interrogatories Nos. 14-26 and Requests for Production of Documents Nos. 1-5, overly broad, unduly burdensome, and oppressive.

2. MCI objects to the BellSouth discovery to the extent that such discovery calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

3. MCI objects to the BellSouth discovery insofar as such discovery is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by MCI in response to the BellSouth discovery will be provided subject to, and without waiver of, the foregoing objection.

4. MCI objects to the BellSouth discovery insofar as such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

5. MCI objects to the BellSouth discovery insofar as it seeks information or documents, or seeks to impose obligations on MCI which exceed the requirements of the South Carolina Rules of Civil Procedure, South Carolina law, the Commission's Public Utilities Rules of Practice and Procedure, or any other applicable laws, rules, or procedures.

6. MCI objects to providing information to the extent that such information is already in the public record before the South Carolina Public Service Commission or which is already in the possession, custody, or control of BellSouth.

7. MCI objects to the BellSouth discovery to the extent that such discovery is overly broad, unduly burdensome, expensive, oppressive, or excessively time consuming as written.

8. MCI objects to each and every request to the extent that the information requested constitutes trade secrets or confidential commercial or financial information of a proprietary nature which are privileged pursuant to S.C. Code Ann. Regs. 103-851, Rule 26, South Carolina Rules of Civil Procedure, and §39-8-60, South Carolina Code of Laws. To the extent that BellSouth's requests seek proprietary confidential business information which is not the subject of any such privilege, MCI will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

9. MCI is a large corporation with employees located in many different locations in South Carolina and in other states. In the course of its business, MCI creates countless documents that are not subject to South Carolina Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved

from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. MCI will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information. To the extent that the BellSouth discovery purports to require more, MCI objects on the grounds that compliance would impose an undue burden or expense.

10. MCI objects to the BellSouth discovery that seeks to obtain “all,” “each,” or “every” document, item, customer, or other such piece of information to the extent that such discovery is overly broad and unduly burdensome. Any answers that MCI may provide in response to the BellSouth discovery will be provided subject to, and without waiver or, this objection.

11. MCI objects to the BellSouth discovery to the extent such discovery seeks to have MCI create documents not in existence at the time of the request.

12. MCI objects to the BellSouth discovery to the extent that such discovery is not limited to any stated period of time or relates to a stated period of time that is longer than is relevant for purposes of the issues in this docket, as such discovery is overly broad and unduly burdensome.

13. In light of the short period of time MCI has been afforded to respond to the BellSouth discovery, the development of MCI’s positions and potentially responsive information to the BellSouth requests is necessarily ongoing and continuing.

14. MCI objects to the BellSouth discovery to the extent it seeks information not within MCI’s possession, control, or custody or to the extent the BellSouth discovery requests that MCI provide information that MCI does not maintain in the ordinary course of business.

15. MCI objects to the BellSouth discovery to the extent it seeks information regarding MCI's projections regarding future services, revenues, marketing, strategies, equipment deployments, or other such future business plans as such requests are trade secrets and, for purposes of this proceeding, would be highly speculative and irrelevant to the issues to be decided in this docket. Moreover, MCI's future plans are irrelevant because the TRO concerns a hypothetical CLEC.

16. MCI objects to each and every interrogatory that seeks information regarding MCI's operations in ILEC service areas other than the BellSouth ILEC service area within the state of South Carolina as such information is irrelevant to BellSouth's case in this docket and such discovery is overly broad and unduly burdensome.

17. MCI objects to each and every interrogatory that seeks to obtain information regarding "former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of MCI" as such information is not within MCI's control, it would be unduly burdensome to attempt to obtain, and it is likely irrelevant.

18. Outside of the discovery request served by BellSouth in this proceeding, there have been discussions between BellSouth and some of the CLECs that this discovery is "regional" in nature and that BellSouth would prefer that the CLECs respond on a regional basis without additional service in these other states. At this point in time, without necessarily agreeing or disagreeing with BellSouth's request for regional answers, MCI reserves its rights to object to providing responsive information for states other than South Carolina.

19. MCI objects to the BellSouth discovery to the extent that such discovery seeks to impose an obligation on MCI to respond on behalf of subsidiaries, affiliates, or other

persons that are not parties to this case on the grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. MCI further objects to any and all BellSouth discovery that seeks to obtain information from MCI for MCI subsidiaries, affiliates, or other related MCI entities that are not certificated by the Commission.

INTERROGATORIES

INTERROGATORY 1. Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you “own” transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Sample Form for Response to Question 1									
	AL	FL	GA	KY	LA	MS	NC	SC	TN

Affirm									
Deny									

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 13, 16 and 19, as if set forth herein verbatim.

INTERROGATORY 2. Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire-centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities, or (ii) if you have obtained on a an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Sample Form for Response to Question 2									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									

Deny									
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MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 3. Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

Sample Form for Response to Question 3									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 4. For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your

own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- a. The CLLI codes of the paired ILEC CO locations that make-up each and every route. In each case show the “low alpha” (alphabetically first) CLLI code as Wire Center A and the “high alpha” CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether you self-provide transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 10, 11, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 5. For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the “low alpha” (alphabetically first) CLLI code as Wire Center A and the “high alpha” CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your wholesale transport facilities are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties; indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)

- f. Whether you are willing and able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 10, 11, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 6. For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 10, 11, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 7. If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 10, 11, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 8. Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Sample Response Form - Question 8: Self-provided facilities for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN

Affirm									
Deny									

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 9. Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3, or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Sample Response Form - Question 9: Self-provided facilities offered on wholesale basis									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									

Deny									
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MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 10. Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you “own” as defined in 8 above should not be included in this response.

Sample Response Form-Question 10: 3 rd Party facilities leased for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 11. Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more

customer locations in each/any of the nine Southeastern states. Self-provided facilities that you “own” as defined in 9 above should not be included in this response.

Sample Response Form-Question 11: 3 rd Party facilities leased for reselling as wholesale service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 12. For each state in Questions 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)

- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facilities is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intrabuilding wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30,2003.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 10, 11, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 13. For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets), identifying:

- a. The RSAG valid address of each customer location.

- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.
- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 10, 11, 13, 16, and 19, as if set forth herein verbatim.

INTERROGATORY 14. Provide a list of all BellSouth wire centers in the Southeastern states to which you are currently in the process of deploying, or plan to deploy transport facilities and/or loop facilities. List wire centers if this deployment is in process or will take place from the time period beginning October 1, 2003 through December 31, 2004.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 15, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 15. List all BellSouth wire centers in the Southeastern states where you have collocation, either virtual or physical. In Microsoft Excel format, list the 11-character wire center CLLI code and the CLLI code designating each arrangement you have within that wire center. For each wire center listed identify:

- a. The type of collocation (caged, cageless, shared, virtual, other (with a description)) and identify the total amount of space currently occupied and reserved for future growth;
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).
- d. The amount of unused or excess space in each collocation space.

- e. The number of active and inactive DS1 cross connects
- f. The number of active and inactive DS3 Cross-connects
- g. The number of active and inactive 2-fiber cross-connects
- h. The number of active and inactive 4-fiber cross-connects.
- i. State whether you have deployed fiber “entrance” facilities that you own which connect to the collocation arrangements identified.
- j. State whether you have fiber “entrance” facilities that you have obtained from a person other than BellSouth which connect to the collocation arrangements identified.
- k. State whether you have fiber cross-connects which connect the identified arrangement(s) to other persons collocated at the same wire center. If yes,
 - (i) identify all carriers to which your arrangements are connected within the wire center; and
 - (ii) identify the capacity or type of connection.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 16. Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states to which you have deployed high capacity transport facilities that are operationally ready to provide dedicated transport along a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. *This interrogatory varies from Interrogatory No. 1 in this docket as it seeks wire*

centers/central offices even if you are not actually providing transport from the locations; it also seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the IXC transport route should be identified:

BST wire center \searrow IXC POP \swarrow IXC POP \nwarrow BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- e. The total active capacity and number of fiber strands deployed as of the most recent date available;
- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement
- d. The total active capacity and number of fiber strands deployed as of the most recent date available;
- e. The type of facility (e.g., fiber, coaxial cable, etc.).

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 17. For each central office/wire center identified in response to Interrogatory No. 16:

- a. Are your transport facilities operationally ready to provide dedicated transport between the central office/wire center identified and any other ILEC wire center on the same list?
- b. If your responses to part (a) above is negative, identify each such the ILEC central offices on the list that does not satisfy part (a) and explain with particularity why not.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 18. Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states from which you offer to other carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that provide a

route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. *This interrogatory varies from Interrogatory No.2 in this docket as it seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the transport route between IXC – points of presence (“POP”) should be identified:*

BST wire center \rightleftharpoons IXC POP \rightleftharpoons IXC POP \rightleftharpoons BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- e. The total active capacity and number of fiber strands deployed as of the most recent date available;
- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;

- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 19: For each central office/wire center identified in response to Interrogatory No. 17:

- a. Are you willing and able immediately to provide high capacity transport, on a wholesale basis, over transport facilities between the wire central office/wire center identified and any other ILEC wire center on the same list?
- b. If your responses to part (a) above is negative, identify each such the ILEC central office/wire center on the list that does not satisfy part (a) and explain with particularity why not.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 20. Identify the points within all Southeastern states at which you connect your local network facilities to the networks of other carriers, including but not limited to interconnection with other CLECs, interexchange carriers, internet service providers at any point of presence (“POP”), network access point (“NAP”), collocation hotels, data centers, or similar facility. This interrogatory may be answered with network diagrams.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 21. Identify the points within all Southeastern states at which you connect your local network facilities to BellSouth's network, including but not limited to any and all points of presence ("POP"). This interrogatory may be answered with network diagrams.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 22. On an MSA-specific basis, in the southern states please describe with specificity the configuration of your transport and/or loop facilities; including, but not limited to: (a) the configuration of your facilities (e.g., point to point or ring configuration); (b) the customer specific locations that are accessible from your facilities; and (c) a list of all customer units accessible in a multi-tenant building.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 23. Provide a list of all fiber rings in the Southeastern states you own or control and identify the location (by street address) of each add-drop multiplexer or comparable facility for connection other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 24. Identify each shared or non-BellSouth location (e.g., collocation hotel) in the Southeastern states in which you are located. For each such location state:

- a. The type of collocation or sharing/leasing of space for placement of equipment (e.g., caged, cageless, shared, or virtual);
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 25. For each arrangement identified in response to Interrogatory 23 and in response to Interrogatory 16, please list the types of services that are provided utilizing such an arrangement.

- a. List all types of services you offer to your end users from each collocation space describe or demand and the quantity of each service you provide and/or offer.
- b. For each service identified in (a), list the average monthly revenue associated with each type of service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 26. Provide a list of all customer locations in each/any of the Southeastern states at which you have deployed high capacity loop facilities (DS3 or greater facilities, including dark fiber) that you own and where you are serving customers using those facilities. *This interrogatory varies from Interrogatory No. 8 in this docket as it is not limited to loop facilities solely used to provide retail service.* For each customer location, identify:

- a. The RSAG valid address of the customer location;
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc. from which the loop is extended to the customer location (by 11 character CLLI);
- c. Whether you have the unrestricted ability to serve all customers at that location, if the location is a multi-tenant location. If not, explain with particularity why not, including any restrictions on your ability to serve customers and the steps you have taken to address such restrictions.
- d. The total active capacity and the number of fiber strands on your facilities at the specific customer locations using the most recent data available;
- e. Whether your facilities are operationally ready to provide DS3 loops at the specific customer location.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

INTERROGATORY 27. Describe with particularity all factors you consider when deciding whether to extend high capacity loop or transport facilities to:

- a. pick up additional traffic;
- b. pick up additional or new customers;
- c. pick up additional or new buildings.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 4, 5, 7, 8, 9, 10, 13, and 14 as if set forth herein verbatim.

REQUESTS FOR PRODUCTION

PRODUCTION REQUEST NO. 1: Produce any maps and/or diagrams that illustrate the most current information available for the physical location of your high capacity transport and/or loop facilities within the Southeastern states.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 5, 7, 8, 9, 10, 13, 14, 16 and 18 as if set forth herein verbatim.

PRODUCTION REQUEST NO. 2: Produce any documents identified in response to BellSouth's First Set of Interrogatories.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16 and 18 as if set forth herein verbatim.

PRODUCTION REQUEST NO. 3: Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your actual or planned deployment of high capacity transport and/or loop facilities within the Southeastern states.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16 and 18 as if set forth herein verbatim.

PRODUCTION REQUEST NO. 4: Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your obtaining high capacity transport and/or loop facilities from other persons.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16 and 18 as if set forth herein verbatim.

PRODUCTION REQUEST NO. 5: Produce all documents from 2000 to present referring or relating to how you determine whether or not to deploy high capacity transport and/or loop facilities.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 16 and 18 as if set forth herein verbatim.

By: _____

| December _____, 2003.

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| _____

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CERTIFICATE OF SERVICE

PERSONALLY APPEARED before me, Betty J. DeHart, who, being duly sworn, deposes and says that she is not a party to these proceedings and has no interest therein; that on the 18th day of December, 2003, she served by mail MCI's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Requests for Production of Documents in the above entitled case upon all counsel of record by causing same to be deposited in an authorized United States Mail Box; that the envelopes containing said document were properly addressed, securely wrapped and sealed and bore the proper postage; and that said envelopes were addressed to the persons indicated below, and via electronic mail by sending copies of same via electronic mail to the email addresses indicated below.

F. David Butler, Esquire The Public Service Commission State of South Carolina Post Office Drawer 11649 Columbia, S.C. 29211 david.butler@psc.state.sc.us	Elliott Elam, Acting Consumer Advocate South Carolina Department of Consumer Affairs Post Office Box 5757 Columbia, S.C. 29250-5757 elam@dca.state.sc.us
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_____		Deleted: William F. Austin, Esq(... [1])
_____ Betty J. DeHart		Deleted: ..
SWORN to before me this _____		Deleted: ¶
_____ day of December, 2003.		Deleted: ¶
_____ (L.S.)		
Notary Public for South Carolina		
My Commission Expires: _____		Deleted: ¶

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